

1 criminal case.

2 Q And then a few sentences later, do you see where it
3 says, quote, I'm used to disappointments. I used
4 to self-harm and have attempted suicide, but I'm at
5 peace now? Do you see that?

6 A Yes, I see that.

7 Q Do you agree that you used to attempt self-harm and
8 suicide but no longer do?

9 A No.

10 Q Did you tell the doctor that?

11 A Yes.

12 Q Was that a truthful statement you told the doctor?

13 A No.

14 Q Why did you lie to the doctor about that?

15 A Because of fear of repercussions about telling him
16 how I really feel.

17 Q Do you agree that you have peace with yourself now?

18 A I have more peace, but I'm not completely at peace.

19 Q Have you had more peace since you started being
20 treated for gender dysphoria?

21 A Yes. I have achieved an amount of peace but not
22 completely.

23 Q Are you at peace right now and generally --
24 generally right now?

25 A No. This entire thing that we have done has

1 wakened a lot of pain and exacerbated what I'm
2 already going through every day, but it needed to
3 be done.

4 Q So the reason you're not at peace right now is
5 because this deposition has brought up past issues?

6 A No, because I'm taking a risk in being truthful
7 about the fact of not hiding my -- about still
8 having suicide attempts, because as far as I know,
9 you guys will tell psych and I'll be in a suicide
10 cell before the day is out. But as I said, it
11 needed to be said.

12 Q Okay. So you don't feel at peace because of your
13 having to talk about past suicide?

14 A No, because I had to admit that I tell them every
15 day I'm smily, I'm okay, just so I don't have to be
16 drugged to the nines where I can't even think for
17 myself and locked in a suicide cell, and now I have
18 to lay that bare because I'm not going to sit here
19 and just lie to you.

20 Q Let me ask a better question. Are you at peace
21 with your gender identity now?

22 A My bad. I am more okay but I am not complete, and
23 I suffer daily because of that.

24 Q On the same page, 1133, if you look at the
25 Impressions paragraph. Are you there?

1 A Yeah. 33, yes. Impressions, I've got that.

2 Q The note says, starting at the second paragraph,
3 "She appears to be articulate, engaging, and
4 forward looking, and has come to terms with her
5 identity to a great extent." Do you agree that
6 you're forward looking?

7 A Yes.

8 Q Do you have plans for the future outside of prison?

9 A I try to focus on the future, so I try to make
10 plans for the future, yes.

11 Q Do you intend to live as a woman outside of prison?

12 A 100 percent.

13 Q Does that give you hope for the future?

14 A It sometimes helps. Most days doesn't.

15 Q Two sentences later, the notes says "Likes to
16 engage in psychotherapy to try and better herself."
17 Do you see that?

18 A Yes.

19 Q Do you agree with that?

20 A Yes.

21 Q So you do like psychotherapy?

22 A The terminology of psychotherapy -- I believe I
23 said psych and he assumed it was psychotherapy. I
24 can't attest -- I'm not a psychologist or if that's
25 even correct what I'm saying.

1 MR. FALK: That is correct. You're not a
2 psychologist.

3 THE WITNESS: Right.

4 Q Has psychotherapy been beneficial to your mental
5 health?

6 A I wouldn't know if I've received psychotherapy or
7 just counseling. I don't know.

8 Q Has counseling been beneficial to your mental
9 health?

10 A Yes. I believe that it has helped a little bit,
11 but the counseling I receive here can never really
12 be counseling because I have to hold back.

13 Q If you could go to page 1130, please.

14 A I'm there.

15 Q Okay. Do you see the paragraph starting "Clinical
16 Impressions"?

17 A Yes.

18 Q Okay. Let me back up. This is a -- a note from
19 Dr. Farjellah on 5-21-23. Do you see that?

20 A Yes.

21 Q And in the Clinical Impressions paragraph he writes
22 "Patient has active diagnosis of borderline
23 personality disorder. Given the gruesome history
24 of murder, 20 years of incarceration, extensive
25 history of suicidality (remote), numerous

1 allegation/incidents of sexual abuse while
2 incarcerated, extreme appearance, and active
3 diagnosis of borderline personality disorder, it
4 appears she meets criteria for BPD. Writer does
5 not recommend moving forward with surgery.
6 Regional Leadership made aware of representation."
7 Do you see that paragraph?

8 A Yes.

9 Q It sounds like Dr. Farjellah did not recommend that
10 you receive surgery?

11 A Okay.

12 Q Do you dispute that?

13 A Absolutely.

14 Q You dispute that he did not recommend you for
15 surgery?

16 A Oh. Well, he never told me he didn't recommend me.
17 I was just saying I dispute that he should -- has
18 any decision in that.

19 Q Oh, I understand that, but --

20 A Okay. My bad.

21 Q -- do you agree that part of Dr. Farjellah's
22 decision appears to be your borderline personality
23 diagnosis?

24 A That appears to be why he made that decision, but I
25 wouldn't know, I'm not him.

1 Q Has any medical professional you've seen
2 recommended that you receive gender-confirmation
3 surgery?

4 A There must have been somebody to push me forward to
5 the evaluation stage, but I don't get --

6 Q Who was that?

7 A I don't know. I don't get to check people's
8 diagnosis. This stuff right here is all
9 confidential. I'm not allowed to look at it
10 usually.

11 Q So you're saying a medical professional pushed you
12 forward to evaluation for --

13 MR. FALK: Okay. He said he assumes that. He
14 doesn't know.

15 Q Oh, you assume?

16 MR. FALK: She doesn't know. I'm sorry. I
17 apologize.

18 Q You assume that?

19 MR. FALK: Sorry.

20 THE WITNESS: You're fine.

21 Q So let me just clear this up. To your knowledge,
22 has any medical professional recommended that you
23 receive gender-confirmation surgery?

24 A Not to my knowledge.

25 Q If you could go to page 1097 of Exhibit 54.

1 (A discussion was held off the record.)

2 A 1097, I am there.

3 Q This is a note from Dr. Farjellah on 6-19-23. Do
4 you see that?

5 A Yes.

6 Q In the Interventions/Methods Provided section, the
7 doctor writes Patient describes that she met a
8 19-year-old woman through a friend in prison
9 several years ago. She said that the woman found a
10 surrogate to get pregnant but the II would be the
11 father. II stands for incarcerated individual,
12 right?

13 A Yeah. This facility does that. None of the other
14 ones do, but yes.

15 Q So did you tell Dr. Farjellah that you intended to
16 be the father of your friend's child?

17 A No, I did not.

18 Q What did you tell Dr. Farjellah about this topic?

19 A I said that I would be co-raising the child and I'd
20 just be another mother. I didn't specify mother.
21 I just think he assumed that I meant father.

22 Q Who is this friend that you -- that is mentioned
23 here?

24 A Her name was Kaitlyn McClarren.

25 Q Why did you agree to be the -- a parent figure to

1 Kaitlyn's child?

2 A Because Kaitlyn asked me. Kaitlyn said would I
3 share the experience with her. I told her that I
4 would.

5 Q Do you have any biological kids of your own?

6 A No, I do not.

7 Q In the Impressions paragraph on page 1097, doctor
8 writes Complex case because of the loss of this
9 child may remind or haunt patient of the loss of
10 her own child whom she brutally murdered in the
11 early 2000s. When it's referring to a loss of a
12 child, is he referring to a loss of Kaitlyn's
13 child?

14 A Could you repeat that? I'm sorry.

15 Q Yeah. Let me back up. In the previous paragraph,
16 do you see the second -- third sentence "However,
17 she recently had a miscarriage"?

18 A Yes.

19 Q And so in the Impressions paragraph when the doctor
20 is talking about the loss of this child may remind
21 or haunt patient of loss of her own child, he's
22 referring to a loss of Kaitlyn's child --

23 A Yes.

24 Q -- from miscarriage?

25 A Yes.

1 Q And do you agree with that impression there?

2 A What would you -- not entirely, no.

3 Q Why not?

4 A She lost her child because of nature. Faith passed
5 away because of me.

6 Q All right. Let's go to Exhibit 61. It is Tab 8 in
7 the binder. It starts with State 6194.

8 (Exhibit 61.)

9 A I've got it.

10 Q Okay. I'd represent to you these are some PREA
11 documents. Do you know what PREA is?

12 A Yes.

13 Q What's your understanding of PREA?

14 A Prison-rape-elimination-act.

15 Q Okay. Since July -- strike that. Since you came
16 out to DOC as transgender, have you been sexually
17 assaulted?

18 A No.

19 Q And if you can go to State 6197, please.

20 A Here we are. I'm there.

21 Q Okay. At the top, it states on 10-19-22, I Allison
22 Yancey was talking to 127630 Jonathan Richardson
23 about his request to transfer to a female facility.
24 I asked him if he had ever documented abuse at any
25 of his facilities and he stated no.

1 A Yes.

2 Q Is that accurate?

3 A Yes. As of the time of this, yes.

4 Q So as of 10-19-2022, you had not reported any
5 sexual abuse?

6 A Yes.

7 Q But then it sounds like on this date you revealed
8 three instances about sexual abuse occurring in the
9 past?

10 A Yes. The three that I were most comfortable with
11 revealing, yes.

12 Q And it looks like those occurred in 2005, 2008, and
13 2016?

14 A Yes.

15 Q Do you know of any transgender gangs within DOC?

16 A The only -- no. I know of a gay gang within the
17 IDOC.

18 Q A gay gang?

19 A Yeah, GBGs, Gay Boy Gangsters.

20 Q Gay Boy Gangsters? Are there any transgender
21 individuals in that gang?

22 A Actually, I think that there was, but they don't
23 tend to like transgenders. They believe if you're
24 part of it, you should just be gay.

25 Q Are there any gangs like that at Branchville?

1 A I believe they tried to get something started here,
2 and the other organizations beat on them for it.

3 Q How do you know that?

4 A I keep my ear to the ground. It's safer that way,
5 to always know what's going on.

6 Q How do you know that someone tried to get an
7 organization like that in here?

8 A Well, because I was asked to -- to affiliate.

9 Q Who asked you to affiliate?

10 MR. FALK: Okay. I'm concerned about -- I
11 realize this is confidential, but I'm concerned
12 about this getting out. So is there some way that
13 we can make sure this is extra confidential? Do
14 you know what I'm saying?

15 MR. CARLISLE: Well, let's agree to mark this
16 portion of the transcript as top secret -- no, as
17 confidential.

18 MR. FALK: Yeah. Are you okay -- are you
19 okay?

20 THE WITNESS: If that's what you guys say,
21 sure. I've got to answer the question.

22 MR. CARLISLE: Can we go off the record?

23 MS. PACTOR: Yes.

24 VIDEOGRAPHER: Going off the record at

25 12:03 p.m.

1 (A discussion was held off the record.)

2 VIDEOGRAPHER: We are back on the record at
3 12:05 p.m.

4 Q All right. We've agreed that if an answer solicits
5 you to identify any specific prisoner, please use
6 initials.

7 A Understood.

8 Q And later if counsel needs to know the identity of
9 those initials, you can discuss with your counsel
10 who will inform us.

11 A Understood.

12 MR. FALK: Thank you.

13 MR. CARLISLE: Yes. Thanks.

14 Q Who told you about someone or some people trying to
15 form a gang at Branchville?

16 A N and D. Oh, and L.

17 Q And are these individuals members of GBB [sic] or
18 different --

19 A Yes.

20 Q -- similar type gang?

21 A Of -- they've changed to now GB because of the last
22 -- G was forced to be dropped because the Vice
23 Lords know that the GD's didn't want them to have
24 that last number.

25 Q And did they invite you to join their organization?

1 A Yes.

2 Q What did you say?

3 A No.

4 Q And so are you -- or have you ever been a member of
5 an organization like GB or GBB?

6 A No.

7 Q Do you associate or have you associated with any
8 members of an organization like GB or GBB?

9 A Yes.

10 Q And were any of those individuals transgender?

11 A Two.

12 Q And what are their initials?

13 A D and B.

14 Q Did you ever discuss your gender dysphoria with D
15 and B -- or B?

16 A Yes.

17 Q Did you ever discuss seeking treatment for gender
18 dysphoria from D or B?

19 A No.

20 Q Did you ever discuss taking legal action in
21 relation to your gender dysphoria with D or B?

22 A No.

23 Q Did D or B ever give you advice related to your
24 gender dysphoria?

25 A No. They asked advice, but they never gave it.

1 Q What kind of advice did they ask from you?

2 A How I look so girl. I'm fish by the term, as they
3 put it.

4 Q What does fish mean?

5 A I blend in. I'm so close to being female, I don't
6 have to fake it to make it.

7 Q Are there -- do you associate with any LGBT
8 identified prisoners at Branchville?

9 A Yes.

10 Q Who are they?

11 A One's name is Nick. The other one is -- well,
12 these are people who are open about being LGBTQ,
13 right, not in the closet?

14 Q That you know --

15 A Right.

16 Q -- as being LGBT.

17 A That's what I was just clarifying. That would be
18 Nick and Rah-Rah. I think his real name is
19 Rasheen.

20 Q Do you hang out with them a lot?

21 A Yeah, at least a couple times each day.

22 Q You're close with them?

23 A Well, not really.

24 Q Have you ever discussed this lawsuit or your gender
25 dysphoria with Nick or Rah-Rah?

1 A Yes.

2 Q What have you discussed with Nick or Rah-Rah?

3 A How frustrated I am that the State can't see that
4 I'm a girl and understand that and help me with all
5 my pain and all my -- my problems. I talk to them
6 about, hey, I'm going to my deposition today, and
7 they're like good luck.

8 Q Anything else?

9 A I mean, I just tell them how I feel about the
10 ongoing legal. I don't really discuss like hard
11 facts. Most inmates aren't interested in book
12 facts.

13 Q It seems like we're outside the initial scope, so
14 do you have last names of Nick or Rah-Rah?

15 A No. All I just know is Rasheen, but I don't know
16 if that's his last name or first.

17 Q Do you know how to spell Rasheen?

18 A R-a-s-h-e-e-n, I think.

19 Q Do you know KS? Am I allowed to use the full name
20 for that?

21 MR. FALK: Sure.

22 MS. PACTOR: Sure.

23 Q Do you know Kelly Stillwell?

24 A I met her once when I got to this facility and --

25 Q And did you just interact with her that one time?

1 A Yeah. It was in the law library. She was doing
2 legal work.

3 Q What did you guys talk about?

4 A She asked me, hey, I hear you're the new trans
5 girl. I said, yeah. And she's like, well, you're
6 looking pretty rockin'. I said, well, you're
7 looking pretty nice yourself. And she -- I was
8 like well, what are you working on? She was like,
9 oh, I'm battling the system. And I was like, well,
10 that's cool. She was like, well, I leave soon, so
11 most of my stuff is going to be moved when I leave.
12 I said, oh, all right. And she says, well,
13 hopefully I get to see you on the outside. I said,
14 that would be nice, and that was basically about
15 it.

16 Q Do you ever get legal advice from other prisoners?

17 A Oh, no. Everyone asks me legal advice. I'm the
18 prison legal person.

19 Q Do you provide the advice when they ask it?

20 A I advise -- I advise them with -- as much as I can,
21 but I tell them they have to do their own research.

22 Q Do you ever advise other prisoners about gender
23 identity issues or dysphoria?

24 A No.

25 Q No?

1 A No.

2 Q I'm going to ask you some questions about sexual
3 history and practices --

4 A Okay.

5 Q -- because it's relevant --

6 A Do I leave this still open or --

7 Q You don't need that exhibit.

8 A Thank you. Because it's relevant to this lawsuit.

9 MS. PACTOR: I object to the statement that
10 it's relevant to this lawsuit but --

11 MR. CARLISLE: Okay. Noted.

12 MR. FALK: I just want to make a formal
13 objection.

14 MS. PACTOR: I noticed you were just sitting
15 there silently.

16 Q You expressed that you identify as bisexual?

17 A Yes.

18 Q Do you identify yourself as a sexual person?

19 A Sensual, not sexual.

20 Q What's the difference between sensual and sexual?

21 A I exude sexuality, but I don't actually just have
22 sex all the time.

23 Q How do you express your sexuality?

24 A I don't really.

25 Q Never?

1 A I have some people hit on me. I have got down with
2 a few people in prison. I've sexually satisfied
3 them. I never really get any reciprocation.
4 That's kind of a non-starter for me as long as I'm
5 stuck with this (indicating).

6 Q When's the last time you experienced sexual
7 pleasure?

8 MR. FALK: I guess I -- I'm going to object
9 now just because I don't think it's at all relevant
10 to the litigation. You can answer, but we have an
11 objection over -- over the relevancy of this.

12 A I suppose 12 years ago, about the time I stopped
13 having any involvement with what was between my
14 legs. It got to the point I just couldn't stand
15 even looking at it, much less touching it.

16 Q And when you say 12 years ago, what happened
17 12 years ago?

18 A It had reached the point that I couldn't even
19 fantasize about being a woman with a man or with a
20 girl and finding any sense of completion because I
21 knew I was touching something that was wrong.

22 Q Let me clarify the question. The last time you --
23 you had sexual pleasure was 12 years ago?

24 A Yes.

25 Q And was that masturbation or partner sex?

1 A Masturbation.

2 Q And did you have an orgasm?

3 A No. That last time is the reason I stopped. It --
4 an hour and a half of trying.

5 Q And since that event 12 years ago, you haven't had
6 any sexual pleasure?

7 A Not pleasure, no.

8 Q Have you ejaculated in the past 12 years?

9 A No.

10 Q Have you had an orgasm within the past 12 years?

11 A No. Maybe in my sleep, but not -- never waking.

12 Q Has there been any point in time in the past
13 12 years where you've wanted to have sexual
14 pleasure?

15 A I mean, all the time. I'm very sexually repressed
16 in prison, but I can't do it while I have this.

17 MR. FALK: And just for the record, by this,
18 do you mean your penis?

19 THE WITNESS: Yes, I do.

20 MR. FALK: Okay.

21 THE WITNESS: Sorry. It's just him saying
22 penis is ugh.

23 MR. FALK: I know. I'm sorry. I -- I can say
24 it.

25 THE WITNESS: It's just wrong.

1 Q So in the past 12 years, it's your testimony you
2 haven't used your penis for sexual pleasure?

3 A No.

4 Q If you could go to Exhibit 24, please. It's in the
5 -- the front flap of the binders.

6 (Exhibit 24.)

7 (A discussion was held off the record.)

8 Q Right here (indicating).

9 A Oh, thank you.

10 Q Showing you Exhibit 24, it is an article written by
11 Miriam Hadj-Moussa called "Feminizing Genital
12 Gender-Confirmation Surgery." Do you see that in
13 front of you?

14 A Yes.

15 Q What do you know about the complications and risks
16 of genital confirmation surgery -- excuse me,
17 gender-confirmation surgery?

18 A Thank you. Well, you can have rejection of the
19 tissue. You can have necroti- -- necrotiz- -- nec-
20 -- the tissue rotting away and decaying. You can
21 have heavy infection. You can have a closing of
22 the new transplant. You can have pain that might
23 be temporary to lingering, numbness. That's about
24 it.

25 Q Where did you learn about these things?

1 A Once I get started on something, I make it my issue
2 to learn. So I read the WPATH SOC8 which talks
3 about some of this. I read pamphlets, and I watch
4 everything I can get ahold of that might talk about
5 it.

6 Q Has any medical professional discussed the
7 complications or risks of gender-confirmation
8 surgery with you?

9 A No, but I -- I assume my surgeon will when the time
10 comes.

11 Q Do you agree that gender-confirmation surgery is
12 irreversible?

13 A Yes.

14 Q Do you know anything about the frequency or rate of
15 any of these complications after
16 gender-confirmation surgery?

17 A Again, I don't know the specific numbers.

18 Q Okay. If you could look at page 7 of Exhibit 24.

19 A I'm there.

20 Q All right. Do you see the "Table 3. Relative
21 frequency of vaginoplasty complications," the title
22 at the top?

23 A Yes. Yes, I do.

24 Q And looking down through this table, you agree that
25 this lists a -- a large number of complications

1 related to gender-confirmation surgery, correct?

2 A I agree there's a large number, but the frequency
3 seems vastly low.

4 Q If you look at -- do you see where it says "Genital
5 complications"?

6 A Yes, I'm there.

7 Q All right. Do you see introital stenosis, the
8 frequency is up to 15 percent?

9 A Uh-huh. Yes, I do. Sorry.

10 Q Do you think -- do you think that is a high rate of
11 complications?

12 A Yes, I do -- I -- my bad. No, I do not believe
13 15 percent is that great of a number.

14 Q No?

15 A No.

16 Q If you could go down to Urinary complications --

17 A I'm there.

18 Q -- do you see where it says misdirected urinary
19 stream up to 40 percent frequency?

20 A Yes.

21 Q Do you think that's a high rate of complication?

22 A Yes, I do, but I also see that the notes state that
23 it could be treated.

24 Q Where does it say that?

25 A Over in notes, tend to spray upward, treat with

1 ventral meatoplasty.

2 Q Do you know what --

3 A Meatoplasty? That just doesn't -- like it's a real
4 word?

5 Q I take it you don't know what ventral meatoplasty
6 means?

7 A No idea, but it apparently can be treated.

8 Q Do you see the next line is LUTS?

9 A Yes, LUTS.

10 Q And that stands for lower urinary tract symptoms?

11 A Yes.

12 Q And that is -- has a frequency rate of up to
13 20 percent. Do you think that's a high rate of
14 complication?

15 A No, not really, plus I've got a small bladder
16 anyways.

17 Q All right.

18 MR. FALK: I guess -- and I'm just going to
19 interpose an objection. Obviously, she is not a
20 doctor. She has never seen this. She doesn't know
21 what the rates are. She did say she would discuss
22 this with a surgeon. You can ask all you want
23 about whether it's high or low, but I don't know
24 what good it does to ask someone who's not a
25 surgeon, but go for it.

1 MR. CARLISLE: This is highly relevant.

2 Q Urinary incontinence has a frequency rate of up to
3 20 percent. Do you see that?

4 A Yes.

5 Q And the previous 20 percent rate you said was --
6 did not seem high to you. But as to urinary
7 incontinence, do you think 20 percent is a high
8 frequency rate?

9 A No.

10 Q If you could jump down to the Wound complications
11 section, do you see wound healing disorders?

12 A Yes, I do.

13 Q Up to 30 percent complication frequency?

14 A Yes.

15 Q Do you think that's a high rate of complication?

16 A I believe that it is a moderate percentage rate.

17 Q Do you know anything about the suicide rate of
18 patients who had gender-confirmation surgery after
19 surgery?

20 A That, I do not.

21 Q Do you know anything about the mental health of
22 patients who undergo gender-confirmation surgery
23 post surgery?

24 A That, I do not.

25 MR. CARLISLE: Can we take a short break?

1 MR. FALK: Uh-huh.

2 MR. CARLISLE: Let's go off the record.

3 VIDEOGRAPHER: Going off the record at
4 12:52 p.m.

5 (A brief recess was taken.)

6 VIDEOGRAPHER: And we are back on the record
7 at 12:35 p.m.

8 Q All right. You filed a lawsuit in the Southern
9 District related to your religion, correct --

10 A Yes.

11 Q -- against Tony Gray?

12 A Yes, I did.

13 Q And if you can go to Exhibit 50, please.

14 (Exhibit 50.)

15 A Okay.

16 Q Do you see what is titled a Motion to Correct
17 Deficiency?

18 A Correct.

19 Q And you filed this?

20 A Yes, I did.

21 Q And the case number is 323-cv-212-RLY-CSW?

22 A Yes.

23 Q And it looks like it's a copy of your trust fund
24 account, right?

25 A Yes, it is.

1 Q And if you can go to page 14.

2 A I'm there.

3 Q And it looks like on December 17th, 2023, you had a
4 trust fund balance of about \$667.92. Do you see
5 that?

6 A What day, again?

7 Q December 17th, 2023.

8 A Ah, yes. And no, that's not a trust account fund
9 balance.

10 Q Okay. What is this balance?

11 A That's re-entry. I can't access it. It's
12 15 percent of anything I have that comes in over
13 all the years put away for my getting out of
14 prison.

15 Q Okay. All right. Then if you could go to
16 Exhibit 60.

17 A Okay.

18 (Exhibit 60.)

19 Q It starts with Plaintiff 47?

20 A Yes.

21 Q Okay. These are documents you produced in
22 discovery in this case. Do you see that?

23 A Yes.

24 Q And it has here the plaintiff's Bates stamp down at
25 the bottom right?

1 A Yes, it does.

2 MR. FALK: Where is it?

3 MR. CARLISLE: It's the last exhibit in the
4 binder rings.

5 Q If you could go to Plaintiff 53.

6 A I'm there.

7 Q All right. Is this your handwriting?

8 A Yes, it is.

9 Q At the top you write "Live stream/podcast ideas"?

10 A Yes.

11 Q So what is this document?

12 A So I want to do some kind of positive change
13 whenever I get to the street. And social media is
14 a very big thing, and so I figured if I can express
15 some of how my life has been in prison, some of the
16 life lessons I've learned, and there might be
17 someone else suffering like I am, that I can help
18 relieve some of their suffering. At least, even if
19 I can't relieve it, let them know that they're not
20 alone.

21 Q Okay. So this document, it sounds like, is a list
22 of ideas of what you want to talk about on that
23 podcast?

24 A Yes. Of course, I don't think they're called
25 podcasts anymore.

1 MR. FALK: Don't look at me.

2 Q I'll let you have that. I -- if you could go to
3 Plaintiff 55.

4 A I'm there.

5 Q You wrote this as well?

6 A Yes, I did.

7 Q What is this document?

8 A Well, it looks like just a basic rant that I
9 sometimes write just to get something that's been
10 bothering my head off on paper. It's not really a
11 journal because I don't keep it consistently, but
12 some days it just bounces around and I need to get
13 it out.

14 Q So this is -- when do you feel the need to write
15 down, as you say, rants like this?

16 A When the stuff I want to say here is what I want to
17 say to other offenders, but that might likely lead
18 me into fights, which I'm trying to stay away from.

19 Q Okay. And if you could read this document and let
20 me know when you've had a chance to read it.

21 A Oh, I know it.

22 Q Okay. So you know -- so in what context -- let me
23 ask you this: What prompted you to write this?

24 A Well, I wrote it because of ways some guys were
25 treating me in the dorm at the time. They were

1 basically trying to mis-gender me, treat me like
2 they understood what my -- my sexuality has
3 anything to do. They keep trying to make it -- I
4 said I like girls. They're like, well, but you --
5 you say you're a transgender. Yes, girls like
6 girls, girls can like guys. It's not one specific.
7 So that's kind of I just got fed up with them and I
8 felt like ranting.

9 Q All right. In the first line when you say
10 sexuality is very palpable when I deal with others,
11 what do you mean?

12 A Well, I'm basically simply saying that my -- I -- I
13 believe there is a -- oh, sexuality is very
14 palpable when I deal with others. I apologize. I
15 exude sexuality. People equate me to being like a
16 cat. I move like a cat does. I constantly am
17 flirty. Even though I don't plan on doing anything
18 with that flirtiness, but I'm constantly flirty,
19 and so I exude being sexual even though I don't
20 have sex with people. That's the best way I can
21 put it, I guess.

22 Q If you could go to page 57.

23 A I'm there.

24 Q Did you write this?

25 A Yes, I did.

1 Q And it says at the top "Surgeries to reach my ideal
2 self"?

3 A Yes.

4 Q When did you write this?

5 A I wrote that a few months ago.

6 Q Why?

7 A Well, I had acquired the WPATH, and they listed all
8 the different gender surgeries that might be able
9 to be obtained after -- well, I mean, that just
10 might be able to be obtained. And so I made a
11 bucket -- not -- a shopping list, a kind of idea
12 of, hey, I would love to have this, but it's not
13 like I have to have this, except for the vagina.
14 The vagina for me, without it, there's no point.
15 Life's not right without it.

16 Q So this is a list of surgeries you want; is that --
17 do I understand you?

18 A Yeah, that I would like to have, though, again, I
19 haven't yet to talk to any form of a doctor to have
20 firm discussions about this.

21 Q When you say your ideal self, what do you mean?

22 A Well, that's hard to put it. I am ever evolving,
23 ever growing. I really don't have that perfect
24 image yet. It's just things that I think can help
25 me move towards it. Are we -- most girls are never

1 completely happy with their body.

2 Q Why do you want gender-confirmation surgery,
3 generally speaking?

4 A So I can stop suffering. So that every month of my
5 day is not constantly spent being reminded of the
6 fact that my body is not who I am.

7 Q What is the cause of your alleged suffering?

8 A Every day what I'm wearing is suited to fit who I
9 -- who I am. You wear a suit. I'm sure it's
10 tailored to fit your size. But every day for me
11 I'm walking around in something that is not the
12 right size; too big, too clumsy, too oafish, too
13 mannish, ungrateful -- graceful. This -- this is
14 -- it's like constantly wearing two -- three sizes
15 too big clothes all the time and then expecting to
16 go out and do ballet. You can't. And it makes my
17 life like that. My life is ballet. The clothes is
18 this body and how it's wrong, and I can't do ballet
19 in this. I can't live my life like this. It's so
20 painful that it makes me want to cry and I do
21 often.

22 Q So the cause of your alleged suffering is your
23 clothes don't fit, I mean, metaphorically speaking?
24 I -- can you --

25 A Okay. I'll put it down to non-metaphorical. I

1 apologize. My body is wrong, and I will never be
2 able to find any kind of peace or relief with a
3 penis still attached to this body because I'm the
4 one who has to look at it every day. I'm the one
5 who has to deal with it every day. And that's what
6 I have to live with, and none of that staying the
7 way it is makes my life tolerable or bearable.
8 Yes, my life is not the worst thing in existence,
9 but continuing -- I'm 40 something, like almost 41.
10 My life -- actually I think I'm 41 now. It's so
11 hard to keep track with no birthdays. I'm not 22
12 or 19. My life has trickled by, and it's because
13 of my bad decisions of why I'm in here, and so I'm
14 not saying I'm blaming anybody, but I am saying
15 that being stuck longer and longer with this is
16 agony. Could you not understand that? I'm sorry,
17 I asked you a question. That's not what I meant to
18 do.

19 Q I'm not going to answer it. Don't worry.

20 A I get it. I apologize, though. I just -- having a
21 penis and continuing to have a penis has been an
22 accumulation of pain. This isn't just today's
23 pain. This is my whole life's pain building and
24 building and never going away.

25 Q You said your body is wrong and having a penis

1 causes you pain?

2 A Yes.

3 Q And is it because when you look at that penis, is
4 that when you feel pain?

5 A Because I feel it. I don't have to look at it. I
6 don't have to observe it. I go out of my way to
7 tuck and mask it. Everyone else is like, oh, my,
8 God, it doesn't even look like you have anything,
9 but I know I do. It's one of the most agonizing
10 things I've ever been through. And I've been
11 raped, beaten.

12 Q Let's talk about your list of surgeries here. The
13 first one is vagina. What do you mean by writing
14 vagina?

15 A Well, I mean I wasn't making it
16 scientific/technical. To have the vaginoplasty is
17 my number one priority. No other changes to my
18 body are going to bring me any sort of peace or
19 sense of self like having my vagina. It will --
20 it's not going to solve my problems. It will just
21 relieve some of this burden that I have to deal
22 with all the time, and lessening -- lessening my
23 suffering is all I'm looking for.

24 Q What won't solve your problems?

25 A Getting a vagina won't solve my problems, but they

1 will lessen my problems so I don't have to suffer
2 as much. If you give a guy a prosthetic, does that
3 mean he shouldn't have a prosthetic because, you
4 know, he's still missing the arm? But it makes his
5 life more tolerable, and I'm pretty sure people
6 would see that as a necessity.

7 Q Do you think vaginoplasty is medically necessary?

8 A Yes, I do.

9 Q Why?

10 A Because if I don't lessen my pain, if I don't bring
11 myself back down to a level of comfort- --
12 comfortable with myself and I continue the way I'm
13 going, I'm just going to eventually commit the
14 suicide that I've failed on so many times in the
15 past. This isn't a threat. I'm not making a
16 promise. I just know myself, and I'm not someone
17 who -- who halves suicide attempts. I don't want
18 to commit suicide. I want to live, but pain can
19 make you do stupid things.

20 Q You write "one cup size bigger than my current size
21 (breast implant)" on page Plaintiff 57. Why do you
22 want one cup size bigger?

23 A That's kind of a what-if. If when I leave my total
24 breast size is adequate, then great, but like I
25 said, it's not something that I can say is correct

1 until it's there. And I may never be happy with my
2 breasts. Us women are very -- very fickle with our
3 -- our boobs.

4 Q I think earlier you told me you haven't had a
5 chance to think about what your breasts will fully
6 be.

7 A Exactly. That's why I made that statement I just
8 did to you.

9 Q Doesn't this indicate that you have thought about
10 what your breasts will fully be?

11 A Not really because they're my current size. If --
12 breast surgery is not guaranteed at all in prison.
13 So if I'm on the streets and I'm still alive and
14 I'm on the streets and I get a breast implant, what
15 size will I be? Will I be a C cup when I leave?
16 Will I be a D cup? So I don't know the full
17 aspects of what my breasts will be. I may not even
18 get the implant if my breasts have reached a --
19 what makes me happy that -- that helps me.

20 Q Do your current breasts as -- do your current
21 breasts cause you distress?

22 A Not greatly.

23 Q But a little bit?

24 A A little bit of uncom- -- uncom- -- not uncomfort.

25 A little bit of like not -- not happy that they're

1 not as perky or as big, but they're not like the
2 worst boobs in existence.

3 Q Would having a breast augmentation lessen your
4 sense of discomfort that you just described?

5 A I really don't know because, again, until I've had
6 a chance to talk to a doctor, I won't even know
7 what they will look like, how they will be. Like I
8 said, it's -- it's -- it's an unknown variable on
9 that one thing.

10 Q It's possible it could lessen your distress?

11 A Yes. I'm sure any feminizing surgeries can lessen
12 the distress that I feel.

13 Q Does that mean all these surgeries you've listed
14 are medically necessary?

15 A If they help relieve my suffering, then ultimately
16 I would say that they are.

17 Q And in this lawsuit, what surgeries are you asking
18 for?

19 A I'm just ask- -- well, I believe there's a whole
20 little slew, but ultimately the vag- --
21 vagioplasty [sic]. They're -- they do something
22 else before that, but just the vaginoplasty as the
23 end result. I'm not looking for a breast implant,
24 a brow lift or reduction or a uterus transplant.
25 I'm looking to have the one thing that bothers me,

1 the one thing that causes me to hurt the most to be
2 fixed.

3 Q If these other surgeries could be medically
4 necessary, why aren't you asking for them?

5 A Because they're not the ones that make me want to
6 kill myself.

7 Q What is a BBL?

8 A Brazilian booty lift. Butt lift. That's where
9 they take fat, inject it into your butt and then
10 cut and do a butt lift.

11 Q Is that a medically necessary surgery?

12 A If it brought me some relieving of my suffering,
13 but, again, for me that's -- that's not the main
14 issue that I have.

15 Q A gluteus transplant, what is that?

16 A A gluteus implant.

17 Q Gluteus implant?

18 A It's where they put an implant into your butt to
19 give it more feminine shape. Rounded, so forth.

20 Q Is that a medically necessary procedure?

21 A All of feminizing treatments listed in the WPATH I
22 would agree would be necessary medical treatments
23 if they relieve my suffering.

24 Q How do you distinguish between a medically
25 necessary treatment and a cosmetic one?

1 A A cosmetic is to be done just to have done so other
2 people look at you and give you a thumbs up or you
3 can sit there and say you're the best looking
4 person or I -- I decide I want to be two inches
5 taller. It doesn't bother me that I'm not two
6 inches taller, it's just I think it would look
7 cool. You know, that's cosmetic. That -- that's
8 getting it done because -- not because you're like
9 I can't live with this, I just think it would be
10 cool or I'd look better with this. I could live
11 the rest of my life that way without it, but, you
12 know, I really want it because that's what I want.

13 Necessary is my life is horrible. My life is
14 pain, daily unrelenting suffering and pain, and
15 having this will help me get back to normal.

16 Q How do you know that any pain you're experiencing
17 is not caused by other mental health issues?

18 A That's a very good question. Because I have had
19 40 years to analyze myself, work on myself, to
20 realize what -- where my pain stems from. I'm not
21 some child deciding to get this done rashly. I
22 need it because I've had time to say is it coming
23 from this, is it coming from that and to single
24 them out to work on those things and realizing that
25 that suffering I go through every day hasn't

1 lessened.

2 Q You still have a borderline personality diagnosis,
3 correct?

4 A I do.

5 Q Do you have any other mental health diagnoses to
6 your knowledge?

7 A Not that I'm aware of, but they change it up every
8 single time that someone new sees me.

9 MR. FALK: And I'm just going to object or
10 interject. Obviously gender dysphoria is a
11 diagnosis. I don't know if you're classifying it
12 as mental health.

13 THE WITNESS: I -- my bad. I apolo- -- yes.
14 I do know that they have me as gender dysphoria
15 listed. I didn't -- I don't think of it like you
16 -- the question you asked as a mental health
17 problem for me. I see it is by what it is, but for
18 me I see it more as a description of my pain.

19 Q Plaintiff 57, you also write down "Tummy tuck
20 (liposuction)"?

21 A Yes.

22 Q And hair removal on your body and face?

23 A Yes.

24 Q Are those medically necessary procedures?

25 A Again, if they help relieve some of the suffering

1 that I'm going through, I do believe that they are
2 medically necessary.

3 Q The last line you write "Wiggs (so many!!!)."

4 A I'm bald, like bald, bald. I shave my head only
5 because I have a few little places that hair grows,
6 so I would like to have wigs. But being bald,
7 bald's still beautiful.

8 Q Are wigs medically necessary?

9 A Oh, no, because, again, I can live bald. It
10 doesn't cause me pain every day. It doesn't cause
11 me pain really at all. I'm just sitting there like
12 ah, I guess I can rock this.

13 Q So it's not medically necessary, but you include it
14 on a list of surgeries to reach your ideal self; is
15 that correct?

16 A Well, wigs aren't surgery either.

17 Q Then why did you include it here?

18 A It was just an afterthought. I didn't intend it as
19 surgery and I didn't think I was writing this as a
20 master list for other people to review.

21 Q If you do not receive all of the things on this
22 list, will you ever reach your ideal self?

23 A I don't know if any of us reaches our ideal self.
24 But as far as me, I don't think even with all these
25 surgeries I'll reach my ideal self, but my

1 suffering will be a lot less.

2 Q So are you saying these procedures would not cure
3 your gender dysphoria?

4 A Well, I didn't say that. I said that as far as
5 having the vagina, I believe it will be lessened
6 significantly.

7 Q But not completely?

8 A Nothing is ever completely fixed and goes away.

9 MR. CARLISLE: All right. That's all the
10 questions I have. Thank you.

11 THE WITNESS: Thank you, sir.

12 MR. FALK: Thank you. Give us a minute here.

13 MR. CARLISLE: Off the record?

14 VIDEOGRAPHER: Go off the record?

15 MS. PACTOR: Yes.

16 VIDEOGRAPHER: Going off the record at
17 12:58 p.m.

18 (A brief recess was taken.)

19 VIDEOGRAPHER: We're back on the record at
20 1:05 p.m.

21 EXAMINATION

22 QUESTIONS BY MR. FALK

23 Q At the beginning of the deposition you were asked
24 by Mr. Carlisle if you'd ever been approached by
25 any STGs, any security threat group. Do you

1 remember that question?

2 A Yes, I do.

3 Q And you said no, I believe?

4 A Yeah, that's what I said.

5 Q And then towards the end of the deposition we were
6 talking about the GBG, the Gay Boy Gang?

7 A Oh, yeah. They're made up mainly of sex offenders,
8 so no one sees them as a legitimate STG
9 organization. Like none of the STG actually even
10 respect them. So I didn't really think about them
11 as an organization, much less a gang.

12 MR. FALK: Okay. I have no further questions.

13 MR. CARLISLE: I can't ask anything on that,
14 so I think we're done.

15 VIDEOGRAPHER: This concludes the deposition.
16 We are off the record at 1:06 p.m.

17 MR. FALK: I did not -- I did not tell you
18 this. You have the right to review this, the
19 transcript, and then -- and then sign it. You can
20 waive signature. I always suggest that people
21 review the transcript. We will get a copy. We
22 will go over it with you.

23 THE WITNESS: I would like to go over the
24 copy, yeah.

25 (A discussion was held off the record.)

1 COURT REPORTER: Mr. Falk, is it okay if I
2 send it to you then --

3 MR. FALK: Please do.

4 COURT REPORTER: -- and you get it to him?

5 MR. FALK: Please do.

6 COURT REPORTER: Okay. Absolutely. We can do
7 that.

8 MR. CARLISLE: We'll have a copy of the
9 transcript and the video.

10 COURT REPORTER: Okay.

11 MR. FALK: And I just need a transcript. We
12 don't need a copy of the video.

13 (Deposition concludes at 1:08 p.m.)
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION

JONATHAN RICHARDSON a.k.a.)	
AUTUMN CORDELLIONÉ,)	
)	
Plaintiff,)	
)	Case No.
-v-)	3:23-cv-135-RLY-CSW
)	
COMMISSIONER, INDIANA)	
DEPARTMENT OF CORRECTION,)	
in her official capacity,)	
)	
Defendant.)	

Job No. 187434

I, JONATHAN RICHARDSON a.k.a.
AUTUMN CORDELLIONÉ, state that I have read the foregoing
transcript of the testimony given by me at my deposition
on February 8, 2024, and that said transcript
constitutes a true and correct record of the testimony
given by me at said deposition except as I have so
indicated on the errata sheets provided herein.

JONATHAN RICHARDSON a.k.a. AUTUMN CORDELLIONÉ

STEWART RICHARDSON & ASSOCIATES
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Indianapolis, IN 46204
(800) 869-0873

1 STATE OF INDIANA)
)
2 COUNTY OF WARRICK)

3
4 I, Sherry D. Lenn, RPR, and Notary Public in
5 and for said county and state, do hereby certify
6 that the deponent herein was by me first duly sworn
7 to tell the truth, the whole truth, and nothing but
8 the truth in the aforementioned matter;

9 That the foregoing deposition was taken on
10 behalf of the Defendant; that said deposition was
11 taken at the time and place heretofore mentioned
12 between 9:24 a.m. and 1:08 p.m.;

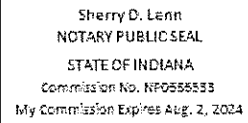
13 That said deposition was taken down in
14 stenograph notes and afterwards reduced to
15 typewriting under my direction; and that the
16 typewritten transcript is a true record of the
17 testimony given by said deponent;

18 And thereafter presented to said witness for
19 signature; that this certificate does not purport
20 to acknowledge or verify the signature hereto of
21 the deponent.

22 I do further certify that I am a disinterested
23 person in this cause of action; that I am not a
24 relative of the attorneys for any of the parties.
25

1 IN WITNESS WHEREOF, I have hereunto set my
2 hand and affixed my notarial seal this 23rd day
3 of February, 2024.
4

5 *Sherry D. Lenn*



Job No. 187434

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